

June 17, 2003

Federal Communications Commission  
Washington, D.C.

Re: Docket 03-104

Dear Commissioners:

I am writing to express my concern that the Commission may amend its rules governing Part 15 devices (i.e., an increase in permissible power and radiation limits) in order to permit implementation of broadband communications over power lines (BPL/PLC) without giving due consideration to the adverse impact such changes will have on radio communications by other, licensed users of the HF radio spectrum and without requiring real and substantial safeguards to protect other users of the HF radio spectrum from interference by BPL/PLC.

Well-documented studies in Europe and Japan have shown that BPL/PLC causes significant harmful interference to HF radio communications. Studies conducted in the United States have also demonstrated that interference caused by this technology is not trivial and is not easily overcome. In fact, such interference is substantial enough to disrupt communication by all but the most powerful radio transmitters, rendering much of the current communication by government, commercial and private users in HF radio spectrum impossible- including users in the service for which I am licensed, amateur radio. Moreover, BPL/PLC has been shown to be highly susceptible to disruption and interference from other signals in the HF radio spectrum.

I believe it is unreasonable to put virtually the entire HF spectrum at risk for BPL/PLC communication when the Commission has provided significant amounts of other radio spectrum available for wireless point-point and point-multipoint wideband communication, particularly above 30 GHz. The national power grid is an extremely poor vehicle to carry out such wideband communication, given the likely serious disruption and interference to many, if not all, of the incumbent HF radio services and the susceptibility of BPL/PLC to interference from such other services.

Proponents of BPL/PLC technology should be required to evaluate and test their delivery systems thoroughly, and demonstrate conclusively that BPL/PLC will not cause harmful interference to other users of the HF radio spectrum. Real and substantial safeguards to protect other users of the HF radio spectrum from interference by BPL/PLC must also be included as part of any amendment to the Commission's Part 15 regulations.

Thank you for your time and consideration.

Sincerely,

Alan D. Gray  
Licensee of Amateur Radio Station W3BV  
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Bedminst